

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

FLAME S.A.,

Plaintiff,

GLORY WEALTH SHIPPING PTE LTD.,

Consolidated Plaintiff,

v.

INDUSTRIAL CARRIERS, INC.,  
VISTA SHIPPING, INC., and  
FREIGHT BULK PTE. LTD., and  
VIKTOR BARANSKIY,

Defendants.

Civil Action Nos.

2:13-cv-00658-RGD-LRL

2:13-cv-00704-RGD-LRL

**PLAINTIFF FLAME S.A.'S MOTION TO CORRECT CAPTION**

Plaintiff Flame S.A. ("Flame"), by counsel, pursuant to Rule 60(a), respectfully moves to correct a clerical error in the caption of this case. In support thereof, Flame states as follows:

1. Flame joins in the Motion to Correct Caption filed by consolidated plaintiff Glory Wealth Shipping Pte Ltd. ("Glory Wealth"), D.E. #414, after recently learning that the correct legal name for defendant "Vista" is Vista Shipping Ltd.

2. Rule 60(a) provides that "[t]he court may correct a clerical mistake or a mistake arising from oversight or omission whenever one is found in a judgment, order, *or other part of the record*. The court may do so on motion or on its own, with or without notice." Fed. R. Civ. P. 60(a) (emphasis added). Rule 60(a) provides relief from clerical mistakes committed by a party. *See Matter of West Texas Mktg. Corp.*, 12 F.3d 497, 503-04 (5th Cir. 1994) ("A mistake

correctable under Rule 60(a) need not be committed by the clerk or the court and Rule 60(a) is even available to correct mistakes by the parties.”).

WHEREFORE, Flame respectfully moves to correct the misnomer and requests entry of the proposed Order attached to Glory Wealth’s Motion to Correct Caption. D.E. #414-3. Because the two cases have been consolidated, entry of the proposed Order will correct the caption of both cases.

Dated: August 22, 2014

**FLAME S.A.**

/s/ David C. Hartnett

Steven M. Stancliff, VSB No. 73853  
David C. Hartnett, VSB No. 80452  
*Attorneys for Plaintiff Flame S.A.*  
CRENSHAW, WARE & MARTIN, P.L.C.  
150 W. Main Street, Suite 1500  
Norfolk, VA 23510  
Tel: (757) 623-3000  
Fax: (757) 623-5735  
[sstancliff@cwm-law.com](mailto:sstancliff@cwm-law.com)  
[dhartnett@cwm-law.com](mailto:dhartnett@cwm-law.com)

- and -

William R. Bennett, III, Esquire  
Lauren B. Wilgus, Esquire  
Nicholas R. Tambone, Esquire  
*Attorneys for Plaintiff Flame S.A.*  
*Admitted Pro Hac Vice*  
BLANK ROME LLP  
The Chrysler Building  
405 Lexington Avenue  
New York, NY 10174  
Tel: (212) 885-5000  
Fax: (212) 885-5001  
[WBennett@BlankRome.com](mailto:WBennett@BlankRome.com)  
[LWilgus@BlankRome.com](mailto:LWilgus@BlankRome.com)  
[NTambone@BlankRome.com](mailto:NTambone@BlankRome.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd day of August, 2014, I electronically filed a true and correct copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such electronic filing to the following counsel of record:

Patrick M. Brogan  
Bryan K. Meals  
DAVEY & BROGAN, P.C.  
101 Granby Street, Suite 300  
Norfolk, Virginia 23510  
Tel: (757) 622-0100  
Fax: (757) 622-4924  
Email: [pbrogan@daveybroganpc.com](mailto:pbrogan@daveybroganpc.com)  
[bmeals@daveybroganpc.com](mailto:bmeals@daveybroganpc.com)  
*Attorneys for Defendant Freight Bulk PTE, LTD.*

Sergei Kachura (pro hac vice)  
LAW OFFICE OF SERGEI KACHURA  
311 N. Center Ave.  
Brownwood, TX 76801  
Tel: (301) 358-5196  
Fax: (325) 646-3628  
Email: [svkachura@yahoo.com](mailto:svkachura@yahoo.com)  
*Attorney for Defendant Freight Bulk PTE, LTD.*

Leonard Fleisig  
David H. Sump  
WILCOX SAVAGE, P.C.  
440 Monticello Ave; Suite 2200  
Norfolk, VA 23510  
Email: [dsump@wilsav.com](mailto:dsump@wilsav.com)  
[lfleisig@wilsav.com](mailto:lfleisig@wilsav.com)  
*Attorneys for Noble Chartering, Inc.*

Paul Myung Han Kim  
John Joseph Reilly  
SQUIRES SANDERS (US), LLP  
30 Rockefeller Plaza; 23rd Floor  
New York, NY 10112  
Tel: (212) 872-9841  
Fax: (212) 872-9815  
Email: [paul.kim@squiresanders.com](mailto:paul.kim@squiresanders.com)  
[John.reilly@squiresanders.com](mailto:John.reilly@squiresanders.com)  
*Attorneys for Noble Chartering, Inc.*

Mark T. Coberly  
Dustin M. Paul  
VANDEVENTER BLACK LLP  
101 W. Main Street  
500 World Trade Center  
Norfolk, VA 23510  
Tel: (757) 446-8600  
Fax: (757) 446-8670  
Email: [mcoberly@vanblk.com](mailto:mcoberly@vanblk.com)  
[dpaul@vanblk.com](mailto:dpaul@vanblk.com)  
*Attorneys for Vitol, S.A.*

James H. Power (pro hac vice)  
Robert T. Hicks  
HOLLAND & KNIGHT, LLP  
31 West 52nd Street,  
New York, NY 10019  
Tel: (212) 513-3200  
Fax: (212) 385-9010  
Email: [James.power@hklaw.com](mailto:James.power@hklaw.com)  
[Robert.hicks@hklaw.com](mailto:Robert.hicks@hklaw.com)  
*Attorneys for Consolidated Plaintiff  
Glory Wealth Shipping Pte Ltd.*

Michael E. Unger (pro hac vice)  
FREEHILL, HOGAN & MAHAR LLP  
80 Pine Street, New York, NY 10005  
Tel: (212) 425-1900  
Fax: (212) 425-1900  
Email: [unger@freehill.com](mailto:unger@freehill.com)  
*Attorney for Vitol, S.A.*

/s/ David C. Hartnett

Steven M. Stancliff, VSB No. 73853  
David C. Hartnett, VSB No. 80452  
*Attorneys for Plaintiff Flame S.A.*  
CRENSHAW, WARE & MARTIN, P.L.C.  
150 W. Main Street, Suite 1500  
Norfolk, VA 23510  
Tel: (757) 623-3000  
Fax: (757) 623-5735  
[sstancliff@cwm-law.com](mailto:sstancliff@cwm-law.com)  
[dhartnett@cwm-law.com](mailto:dhartnett@cwm-law.com)